

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Linda McCahill Case No. 19-34437 Chapter 13

All Cases: Moving Creditor Exeter Finance, LLC Date Case Filed December 06, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed February 28, 2020

Chapter 7: ☐ No-Asset Report Filed on _____

☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

a. ☐ Home

b. ☒ Car Year, Make, and Model 2014 FORD Focus Sedan 4D SE I4

c. ☐ Other (describe) _____

2. Balance Owed as of Petition Date \$ 6,269.49

Total of all other Liens against Collateral \$ _____

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 6,425.00

5. Default

a. ☐ Pre-Petition Default

Number of months 0.000 Amount \$ 0.00

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 2.343 Amount \$ 458.45

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months _____ Amount \$ _____

6. Other Allegations

a. ☒ Lack of Adequate Protection § 362(d)(1)

i. ☒ No insurance

ii. ☐ Taxes unpaid Amount \$ _____

iii. ☒ Rapidly depreciating asset

iv. ☐ Other (describe) _____

b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) _____

ii. ☐ Multiple Filings

iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: June 17, 2020

/s/ Jennifer Rinn

Counsel for Movant